

## Morse, Bob

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**From:** Morse, Bob  
**Sent:** Friday, May 17, 2019 2:07 PM  
**To:** Randy.W.Battaglia@usace.army.mil  
**Cc:** Melissa.Sweet@dec.ny.gov; Pocze, Doug; Metz, Chloe; Singh, Sharissa  
**Subject:** FW: SEAD 25 (Fire Training and Demo Pad) draft 2018 LTM Report

Randy,

Additional clarification is needed regarding EPA's previously stated position on the above LTM Report. I apologize for this on the one hand, but on the other hand the additional research I have done will help the Army to more efficiently deal with the requested cessation of groundwater monitoring, and the eventual removal of the groundwater LUC/IC (if the Army ever wishes to do that). Subsequent to sending you the May 14, email below, I consulted with EPA management as well as legal and technical staff. Contrary to my 5/14 email, a modification to the ROD is not appropriate at this time. However, more work is required.

The ROD for SEAD-25 states that the groundwater plume shall be monitored until NYSDEC Class GA standards are achieved. The RAOs include NYSDEC standards for a number of VOCs and SVOCs. The ROD also imposes a groundwater use LUC/IC. These 2 requirements are tied together in terms of what is needed (i.e., achievement of NYSDEC Class GA groundwater standards). Furthermore, the ROD states that the soil excavation will mitigate further impacts to GW. Whether or not that has been accomplished will be more of a judgement call, one that EPA will make in the future.

To show that the RAOs (NYSDEC standards) have been achieved, EPA GW policy requires use of the Superfund Groundwater Completion Strategy. The Strategy requires a statistical analysis of the GW data. It does not appear that that analysis has been performed yet by the Army. It is also not clear that there is sufficient data to perform the required analysis. Rather than cease GW monitoring, performing the analysis will probably require the gathering of additional GW data. The Strategy also discusses conducting more frequent GW monitoring as the RAOs are close to being achieved. For the Army, this could mean a return to quarterly GW monitoring at the site. Therefore, for the Army to evaluate how it wants to proceed, the Army will have to consult the Strategy. Here is the link:

<https://www.epa.gov/superfund/superfund-groundwater-groundwater-response-completion>

Note also that at least one round of GW monitoring will most likely be required for SEAD-25's Five-Year Reviews until the site is closed out.

Last, it is up to the Army as to whether it wants to submit a revised or final 2018 LTM Report for SEAD-25. It may be more efficient to simply reply to this email regarding the Army's near-term plan for GW monitoring at the site.

Please let me know if you have any questions regarding this email.

Bob

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**From:** Morse, Bob  
**Sent:** Tuesday, May 14, 2019 1:57 PM  
**To:** Randy.W.Battaglia@usace.army.mil  
**Cc:** Melissa.Sweet@dec.ny.gov; Pocze, Doug <Pocze.Doug@epa.gov>  
**Subject:** SEAD 25 (Fire Training and Demo Pad) draft 2018 LTM Report

Randy,

EPA has reviewed the SEAD 25 (Fire Training and Demo Pad) draft 2018 LTM Report.

We agree with the Report's ultimate recommendation to continue sampling groundwater at the site. We also agree with the Army recommendation to prepare a modification to the ROD to address the ROD requirement for groundwater monitoring until NYSDEC Class GA standards are achieved.

Please let me know if you have any questions. Thank you.

Bob

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